

### **REMARKS**

Reconsideration and allowance in view of the foregoing amendment and the following remarks are respectfully requested. None of pending Claims 1-45 is presently amended.

### **THE REJECTION UNDER 35 U.S.C. §102(e)**

Claims 1-5, 8-26, 34-36, and 38-45 have again been rejected under 35 U.S.C. §102(e) as being anticipated by Katz et al. (U.S. Patent 6,356,971; hereafter "Katz").

The points of rejection asserted in the outstanding Office Action are substantially similar to those included in the Office Action of July 2, 2003. However, the present rejection does cite additional portions of the Katz reference, further to those cited in the previous Office Action. The Applicant submits that even the additionally cited portions of Katz fail to anticipate the rejected claims, and therefore the Applicant respectfully maintains its traversal to this rejection for the reasons provided in the Amendment of October 21, 2003, as well as the further arguments presented below.

In particular, Katz describes a CD directory database having a directory tree corresponding to a CD removed therefrom when that CD is removed from disc changer device. Katz further describes constructing persistent playlists corresponding to CDs that are no longer loaded in disc changer device. But Katz's description does not include any teaching of such persistent playlists corresponding to another version of the tracks corresponding to the absent CDs.

Further to the absence of any teaching regarding the “another version of the data” as recited in Claim 1, Katz’s description lacks any teaching of maintaining meta data for content that would correspond to such “another version of the data.”

The “Response to Arguments” in the outstanding Office Action notes:

“another version of the data in the corresponding one of the plurality of pieces of content” corresponds to a piece of content (i.e. a song) stored in a plurality of CDs with different Artists (i.e. a same song could be performed by two different Artists and could be stored in one CD or in another CD). These metadata are stored and maintained in Database 230, 240, 250 of Fig. 1.” (see Office Action, page 17).

However, Katz does not describe any data stored in CD information database 230, playlist database 240, or collections database 250 being altered “in response to the meta data associated with the corresponding one of the plurality of pieces of content being altered,” as recited in Claim 1.

The portions of the Katz reference cited in the rejection fail to anticipate “altering the meta data associated with one of the other plurality of pieces of content in response to the meta data associated with the corresponding one of the plurality of pieces of content being altered,” as recited in Claim 1. They also fail to support the counter-argument asserted in the “Response to Arguments.”

At col. 7, lines 28-39, Katz describes the user entering disc information retrieved from an Internet database. There is no teaching or suggestion that such user action is performed “in response to the meta data associated with the corresponding one of the plurality of pieces of content being altered,” as recited in Claim 1.

At col. 8, lines 53-57, Katz describes records in CD information database 230 being maintained persistently even if the disc is removed from disc changer device 120 or to another slot altogether. There is no teaching or suggestion of meta data being altered, much less “in response to the meta data associated with the corresponding one of the plurality of pieces of content being altered,” as recited in Claim 1.

At col. 4, line 42 through col. 5, line 7, Katz describes device driver 290 automatically updating CD directory database 255 with the information stored in CD information database 230, playlist database 240, and collections database 250. There is no teaching or suggestion of database 255 being updated “in response to the meta data associated with the corresponding one of the plurality of pieces of content being altered,” as recited in Claim 1.

At col. 10, lines 31-39, Katz describes CD directory database 255 having a directory tree corresponding to a CD removed therefrom when that CD is removed from disc changer device 120. There is no teaching or suggestion of any data being altered “in response to the meta data associated with the corresponding one of the plurality of pieces of content being altered,” as recited in Claim 1.

Thus, for at least the above reasons, it is submitted that Katz is fundamentally deficient with regard to Claim 1 and corresponding dependent **Claims 2-5 and 8.**

With regard to **Claim 9**, the “Response to Arguments” (see Office Action, page 18) asserts that “Katz teaches changing, based on the identification, metadata corresponding to the one or more other pieces of content in Fig.

4C...These metadata would be changed when the user changes the song in the playlist (i.e. add, delete), a particular metadata corresponds to a piece of content (i.e. song).” However, the portion of the Katz reference cited to support such assertion, col. 7, lines 62-67, actually states:

Logical paths of tracks and CDs are stored in playlist entries using unique volume identifier retrieved from the discs. Logical paths of tracks and CDs are resolved to slot numbers at runtime (when tracks are accessed for playback). Tracks or files can be added to a playlist by drag-and-drop operations from track file list 460 into playlist 475.

The Applicant respectfully submits that such description fails to teach, describe, or anticipate any of the features of Claim 9. Specifically, Katz fails to teach the computer-readable media causing one or more processors to perform acts of:

receiving an identification of a change to be made to meta data corresponding to a particular piece of content on a particular piece of media;  
changing, based on the identification, meta data corresponding to the particular piece of content;  
identifying one or more other pieces of content associated with the particular piece of content; and  
changing, based on the identification, meta data corresponding to the one or more other pieces of content.

Thus, for at least the reason set forth above, Claim 9 and corresponding dependent **Claims 10-16** are distinguishable over Katz.

The system recited in **Claim 17** comprises, in part:

a meta data management module, configured to alter meta data associated with one of the other plurality of pieces of content in response to meta data associated with the corresponding one of the plurality of pieces of content being altered.

For reasons similar to those set forth above regarding Claim 1, it is respectfully submitted that Katz does not teach altering meta data that is associated with another piece of content “in response to meta data associated with the corresponding one of the plurality of pieces of content being altered,” as recited in Claim 17. Therefore, Claim 17 and corresponding dependent **Claim 18** are distinguishable over Katz.

With regard to computer-readable media **Claim 19** and corresponding dependent **Claim 20**, it is respectfully maintained that Katz fails to teach, at least, the instructions for “accessing a local meta data store to identify meta data corresponding to the tracks and associated with another disc,” or “generating a new storage structure, corresponding to the disc, and including the identified meta data.” Rather, col. 8, lines 36-44 of Katz describe playlists composed of “tracks from multiple CDDA discs...digital multimedia clips stored on different CD-ROMs or on a hard-disk of a computer...playlists composed of mixtures of CDDA tracks on CDDA discs and digital multimedia clips stored on CD-ROMs or a hard-disk drive of computer 110.” Such description does not indicate that local meta data is accessed to identify metadata corresponding to the tracks and associated with another disc. Thus, for at least the above reasons, Claim 19 and corresponding dependent **Claim 20** are distinguishable over Katz.

With regard to the method of **Claim 21**, Katz does not teach, or even suggest the claimed “identifying, from a meta data store, meta data corresponding to the plurality of pieces of content and associated with the one or more other pieces of content.” Rather, col. 9, lines 28-47 of Katz describes the construction of playlists using persistent entries. That is, the playlists may be

constructed whether or not the CD is loaded into a disc changer device. However, such description does not anticipate Claim 21, in particular the aforementioned feature, contrary to the assertion made in the Office Action. Therefore, for at least the reason set forth above, Claim 21 and corresponding dependent **Claims 22-26** are distinguishable over Katz.

**Claim 34** comprises a set of entries and another set of entries identifying relationships between selected ones of the objects identified in the set with selected others of the objects. Col. 6, lines 41-59 of Katz, on the other hand, describes multiple entries describing various objects, but none of the entries identify relationships between objects. To even suggest the aforementioned feature of Claim 34, Katz would have to contemplate any of the files stored on CDs on disc changer device being related to files stored on the other storage devices of computer 110. The reference is silent in that regard, and therefore Katz fails to anticipate Claim 34 and corresponding dependent **Claims 35-37**.

Further, **Claim 38** and corresponding dependent **Claims 39-45** are distinguishable over Katz, which lacks any teaching of data corresponding to more than one version of the tracks corresponding to the CDs. At col. 7, lines 28-33, Katz describes the user entering disc information. However, there is no indication that such entry of information identifies a file associated with the content track, wherein the file stores a different version of the data in the content track, as recited in Claim 38.

Accordingly, for at least the reasons set forth above, it is respectfully submitted that Katz does not anticipate the rejected claims, and therefore the rejection under 35 U.S.C. §102(e) should be withdrawn.

### **THE REJECTION UNDER 35 U.S.C. §103(a)**

Claims 6, 7, 27-33, and 37 have again been rejected under 35 U.S.C. §103(a) as being unpatentable over Katz in view of Bergman et al. (U.S. Patent 6,564,263; hereafter “Bergman”). The Applicant respectfully maintains its traversal to this rejection for at least the reasons provided in the Amendment of October 21, 2003, the above arguments distinguishing the rejected claims over Katz, and the following arguments as well.

Claims 6 and 7 are distinguishable over Katz for the reasons set forth above with regard to the rejection of Claim 1, from which Claims 6 and 7 depend. Bergman does not compensate for the deficiencies of Katz with regard to Claim 1, nor is such assertion made in the rejection.

With regard to **Claim 27**, it is acknowledged that Katz does not teach the “additional objects” recited in the claim. Bergman does not compensate for such deficiencies. Rather, the annotations, metadata, and additional DS described at col. 8, lines 54-67 of Bergman provide global descriptions of content. These global descriptions are not even suggestive of the claimed “additional objects” since there is no teaching that the global descriptions “correspond to a file associated with the track corresponding to the child object” or may be associated with the child object, as recited in Claim 27.

The Applicant submits that the rejection attempts to obviate Claim 27 by merely combining the descriptors from references in a similar field of art, without disclosing a relationship between such descriptors. Thus, there is no

suggestion or motivation to combine Katz and Bergman, which is required to establish a *prima facie* case of obviousness. Therefore, it is submitted that Claims 27 and its corresponding dependent **Claims 28-33** would not have been obvious to one of ordinary skill in view of Katz and Bergman.

**Claim 37** is distinguishable over Katz for at least the reasons set forth above regarding Claim 34, from which Claim 37 depends. Bergman does not compensate for such deficiencies, nor is that assertion made in the rejection.

Therefore, for at least the reasons provided above, in addition to the reasons set forth in the Amendment of October 21, 2003, it is respectfully submitted that the rejected claims are not obvious in view of Katz and Bergman. It is respectfully requested that the outstanding rejection under 35 U.S.C. §103(a) be withdrawn.

#### CONCLUSION

All objections and rejections having been addressed, it is respectfully submitted that the present application is now in condition for allowance. Early and forthright issuance of a Notice of Allowability is respectfully requested.

Respectfully Submitted,

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